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January 16, 2020

JONATHAN R. STREETER

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BY EMAIL

The Honorable Denise Cote
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Lavidas*, S1 19-cr-00716

Dear Judge Cote:

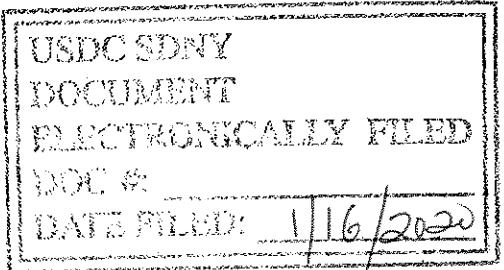
I write to request that Your Honor recommend to the Bureau of Prisons that Telemaque Lavidas, Marshall Number 87315-054, be kept at the Metropolitan Correctional Center or MCC, where he has been since his arrest on October 18, 2019, rather than being transferred to the Metropolitan Detention Center or MDC, pending his sentencing in this matter. Keeping him at the MCC will facilitate regular visits with his undersigned counsel to prepare his sentencing submission that is due to Your Honor on April 3, 2020, and to prepare for his sentencing, which is scheduled for April 17, 2020. The defense has no intention of delaying either of those dates. Moreover, keeping him at the MCC will facilitate visits with his lawyer from Greece who stays in Manhattan when he is in New York to meet with Mr. Lavidas. It will also facilitate visits with his pregnant wife, 18-month old daughter and younger twin sisters, all of whom live in Manhattan and visit with him as much as permitted by the MCC. In addition, it will facilitate visits by his other family members, who regularly fly to New York from Greece and stay at his family home in Manhattan, to visit him.

Respectfully submitted,

Jonathan R. Streeter

cc: The Metropolitan Correctional Center (by fax 646-836-7665)
AUSAs Richard Cooper and Daniel Tracer
Eric Sussman and Jennifer Achilles

MEMO ENDORSED



United. The Bureau of
Prisons must manage
over crowding and other
security issues at its
discretion.

Denise Cote
1/16/20